

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address GOLDEN GOODRICH LLP Jeffrey I. Golden, State Bar No. 133040 jgolden@go2.law Beth E. Gaschen, State Bar No. 245894 bgaschen@go2.law 650 Town Center Drive, Suite 600 Costa Mesa, California 92626 Telephone 714-966-1000 Facsimile 714-966-1002 <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Chapter 7 Trustee Edward M. Wolkowitz	FOR COURT USE ONLY
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UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: HOPLITE, INC. Debtor.	CASE NO.: 2:21-bk-12663-ER (Jointly Administered) CHAPTER: 7
In re: HOPLITE ENTERTAINMENT, INC. Debtor. Affects Hoplite, Inc. Debtor(s).	NOTICE OF SALE OF ESTATE PROPERTY

Sale Date: 08/23/2023	Time: 10:00 am
Location: United States Bankruptcy Court, Courtroom 1568, 255 E. Temple Street, Los Angeles, CA 90012	

Type of Sale: ☒ Public ☐ Private **Last date to file objections:** 08/09/2023

Description of property to be sold: All of the Estates' right, title and interest in and to scripted and unscripted reality television programs created, produced, and still owned by the Debtors, either by individual shows or in a series, and associated production rights that are either held directly or indirectly by the Debtors ("TV Library") (excluding the series "Geared Up" and any rights of title or interest of the Debtors related to "Geared Up"), free and clear of any and all liens, claims and interests. See attached notice of hearing.

Terms and conditions of sale: Subject to overbid. Sale is "as is, where is," with no warranties or guaranties of any kind. Offer must be non-contingent and "all cash" to the estate. Subject to Bankruptcy Court approval. Other terms and conditions apply; see motion on file with the Clerk of Court.

Proposed sale price: \$ 50,000.00
plus the waiver of administrative claim and secured claim

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Overbid procedure (if any): Overbid increments: \$290,000.00 initial / \$5,000.00 thereafter. See attached overbid procedures.

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

Sale Date: August 23, 2023 at 10:00 a.m.

Location

United States Bankruptcy Court, Courtroom 1568
Central District of California, Los Angeles Division
255 E. Temple Street, Los Angeles, CA 90012

Contact person for potential bidders (include name, address, telephone, fax and/or email address):

Beth E. Gaschen, Esq.
Golden Goodrich LLP
650 Town Center Drive, Suite 600
Costa Mesa, CA 92626
714-966-1000; 714-966-1002
bgaschen@go2.law

Date: 08/02/2023

Overbid Procedures - Case No. 2:21-bk-12663-ER

The Trustee proposes the following procedure to allow for overbids prior to the Court's approval of the sale of the Assets to ensure the Assets are sold for the best possible price:

1. Qualifying bidders ("Qualifying Bidder") shall:
 - a. Bid at least \$290,000 in cash for the Assets;
 - b. Set forth in writing the terms and conditions of the offer that are at least as favorable to the Trustee as those set forth in the Agreement attached as **Exhibit 1**;
 - c. Be financially qualified, in the Trustee's exercise of his sound business judgment, to close the sale;
 - d. Submit an offer that does not contain any contingencies to closing the sale, including, but not limited to, financing, inspection, or repair contingencies;
 - e. Deliver a written offer and evidence of financial qualification to the Trustee's counsel (at the address shown in the upper left hand corner of the first page of this Motion) by no later than two business days prior to the hearing on this Motion which is currently set for August 23, 2023 at 10:00 a.m. (*i.e.*, August 21, 2023) ("Overbid Deadline"). In his absolute and sole discretion, the Trustee shall have the right to accept additional overbids submitted after the Overbid Deadline.
2. If the Trustee receives a Qualified Bid by the Overbid Deadline, an auction will take place at the time of the hearing on the Motion ("Auction"). Only the Buyer and any party who is deemed a Qualifying Bidder shall be entitled to bid.
3. Any incremental bid in the bidding process shall be at least \$5,000.00 higher than the prior bid for the Assets.

4. Upon conclusion of the Auction, the Trustee shall decide, subject to Court approval, which of the bids is the best bid, and such bid shall be deemed to be the "Successful Bid." The bidder who is accepted by the Trustee as the successful bidder ("Successful Bidder") must pay all amounts reflected in the Successful Bid in cash no later than 5 days after the Effective Date. The Trustee may also acknowledge a back-up bidder ("Back-Up Bidder") which shall be the bidder with the next best bid. Should the Successful Bidder fail to close the sale of the Assets, the Trustee may sell the Assets to the Back-Up Bidder without further Court order.

5. Overbids shall be all cash and no credit shall be given to the purchaser or overbidder(s).

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Counsel for Edward M. Wolkowitz,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re

HOPLITE, INC.,

Debtor.

Case No. 2:21-bk-12663-ER (Jointly
Administered with Case No. 2:21-bk-12546-
ER)

Chapter 7

In re

HOPLITE ENTERTAINMENT, INC,

Debtor.

**NOTICE OF HEARING ON CHAPTER 7
TRUSTEE'S MOTION FOR ORDER:**

- (1) **AUTHORIZING SALE OF PERSONAL
PROPERTY FREE AND CLEAR OF
LIENS, CLAIMS, AND INTERESTS
PURSUANT TO 11 U.S.C. §§ 363(b)
AND (f);**
- (2) **APPROVING OVERBID PROCEDURES;**
- (3) **APPROVING BUYER, SUCCESSFUL
BIDDER, AND BACK-UP BIDDER AS
GOOD-FAITH PURCHASER
PURSUANT TO 11 U.S.C. § 363(m);**
- (4) **WAIVING ANY LODGING PERIODS
AND ANY STAY OF THE ORDER ON
THE MOTION; AND**
- (5) **APPROVING SETTLEMENT
PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 9019**

Affects:

- ☒ Both Debtors
☐ Hoplite, Inc.
☐ Hoplite Entertainment, Inc.

Hearing:

DATE: August 23, 2023
TIME: 10:00 a.m.
CTRM: Courtroom 1568
255 E. Temple Street
Los Angeles, CA 90012

TO THE DEBTORS, CREDITORS, OFFICE OF THE UNITED STATES TRUSTEE AND ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on **August 23, 2023, at 10:00 a.m.** in the United States Bankruptcy Court for the Central District of California, Los Angeles Division, located at 255 E. Temple Street, Los Angeles, California, in Courtroom 1568, the Court will hold a hearing on the *Motion for Order: (1) Authorizing Sale of Personal Property Free and Clear of Liens, Claims, and Interests Pursuant to 11 U.S.C. §§ 363(b) and (f); (2) Approving Overbid Procedures; (3) Approving Buyer, Successful Bidder, and Back-up Bidder as Good-Faith Purchaser Pursuant to 11 U.S.C. § 363(m); (4) Waiving any Lodging Periods and any Stay of the Order on the Motion; and (5) Approving Settlement Pursuant to Bankruptcy Procedure 9019 ("Motion")*¹ filed by Edward M. Wolkowitz, the chapter 7 trustee ("Trustee") for the jointly administered bankruptcy estates ("Estates") of Hoplite, Inc. ("Hoplite" or "Debtor") and Hoplite Entertainment, Inc. ("Hoplite Entertainment" or "HEI" and together with Hoplite, "Debtors"), which seeks an order:

1. approving the Agreement (defined below) and the sale of the Estates' right, title and interest in and to scripted and unscripted reality television programs created, produced, and still owned by the Debtors, directly or indirectly, either by individual shows or in a series, and associated production rights that are either held directly or indirectly by the Debtors ("TV Library"), as specified in Exhibit A attached to the Motion (together, "Assets") (excluding the series *Geared Up* and any rights of title or interest of the Debtors related to *Geared Up*), free and clear of any and all liens, claims, and interests, including the BondIt Loan and the Buffalo 8 Administrative Claim, pursuant to 11 U.S.C. §§ 363(b) and (f);

a. to Buffalo 8 Productions, LLC ("Buyer" or "Buffalo 8"), whose address is 1639 11TH Street, #160, Santa Monica, California 90404, for \$50,000.00 plus the waiver of its chapter 7 administrative claim for over \$200,000 and its secured claim for approximately \$400,000 ("Purchase Price") pursuant to the terms of the Asset Purchase Agreement ("Agreement") attached as Exhibit "1" to the Motion; or

b. to the successful bidder whose purchase offer for the Assets is accepted by the Trustee at the hearing on the Motion;

2. approving the overbid procedures set forth in the Motion as summarized below;

3. approving the Buyer, the successful bidder, and the back-up bidder as a "good faith" purchaser under § 363(m) of the Bankruptcy Code;

4. authorizing the Trustee to pay, from the net proceeds, any tax liability to the Estates from the sale;

5. authorizing the Trustee to pay, from the sale proceeds, the amounts owed to SMF Fund and 23 Capital on the Effective Date;

6. authorizing the Trustee to enter into the Agreement pursuant to Federal Rule of Bankruptcy Procedure 9019(a) and to take any and all necessary actions to consummate the sale of the Assets and the settlement as set forth in the Agreement;

¹ All capitalized terms have the same meaning or definition as the capitalized terms in the Motion.

7. waiving any requirements for lodging periods of the order approving the Motion imposed by Local Bankruptcy Rule 9021-1 and any other applicable bankruptcy rules; and

8. waiving the stay of the order approving the Motion imposed by Federal Rule of Bankruptcy Procedure 6004(h) and any other applicable bankruptcy rules.

The Trustee does not believe there will be any tax consequences from the sale. If there is any net gain to the Estates, it will be paid from the sale proceeds.

On August 30, 2020, BondIt LLC ("BondIt"), which was founded by the same individuals who founded the Buyer, lent Hoplite Entertainment \$400,000.00. BondIt recorded a UCC-1 against Hoplite Entertainment on December 8, 2020 ("BondIt Loan"). The BondIt Loan is further secured by a personal and corporate guarantee from Jon Smith. The Debtor made a \$12,000.00 payment on the BondIt Loan on February 9, 2021.

On July 28, 2002, the Trustee filed his *Motion for Order Approving Storage Services Agreement Pursuant to 11 U.S.C. § 363* (Docket No. 184, "Storage Motion"). By the motion, the Trustee sought approval of a Storage Services Agreement ("Storage Agreement") between the Trustee and Buffalo 8, pursuant to which the Buyer would verify and assess the origin files for the TV Library, backup the TV Library to LTO tape, and store and backup the TV Library. In exchange for these services, the Buyer would receive \$72,950.00 for the work it performed from April 27, 2021, through November 30, 2021, and ongoing fees of \$7,500.00 per month for storage and backup of the TV Library until the Agreement was terminated or the TV Library was sold, whichever occurred first. The fees were to be an administrative claim of the Estates to be paid from the sale of the TV Library ("Buffalo 8 Administrative Claim"). The Storage Motion was approved by order entered on September 2, 2022. As of April 30, 2023, accumulated expenses to Buffalo 8 totaled \$207,950.00.

PLEASE TAKE FURTHER NOTICE that the Trustee seeks to sell the Assets free and clear of any and all liens, claims, and interests, including the BondIt Loan and the Buffalo 8 Administrative Claim, which were waived as part of the Purchase Price.

Based upon a review of the Hoplite's schedules, filed proofs of claim, and search of filed UCC-1s, the following are creditors that hold liens against Hoplite:

Creditor	Amount	Collateral
Bay Point Capital Partners II, LP	\$2,970,227.78	All assets of the Debtors
Columbia Bank	\$1,639,000.00	All assets of the Debtors
MBO Northwest	\$450,000.00	Multiple productions
OZE Lending	\$908,093.15	Multiple productions ²
Porta Pellex	\$1,564,893.24	All assets of Hoplite
Richard Peterson	\$900,000.00	Multiple productions ³

² There does not appear to have been a UCC-1 recorded as of the petition date making this secured claim unperfected.

³ According to the Debtor's schedules, Mr. Peterson holds a secured claim, but according to the proofs of claim filed by Mr. Peterson, he does not hold a secured claim. As such, he is being treated as an unsecured creditor.

1	SMF Fund I LLC	\$1,100,000.00	All assets of Hoplite
2	Alpine Productions	\$1,010,000.00	No collateral listed in schedules
3	Chad Oliver/Charlie's Talent	\$367,986.35	Multiple productions ⁴
4	Great Point Media	\$Unknown	Multiple productions
5	Angelonia Media Ltd.	\$763,955.32	Culinary Escapes
6	Green Ash Pictures, Ltd.	\$1,059,822.71	Fighting Superstars
7	Hallward Pictures Ltd.	\$133,609.32	Tour-Ett's On Stage
8	Roxbourne Media Ltd	\$1,366,093.15	Social Etiquette and Misguided Tours
9	Split Prism Media Ltd.	\$513,771.78	Formula Dreams, This is E-Sports, and Guitar Hunters
10	Takuu Media Ltd.	\$876,304.53	The Seven
11	Gary Danklefsen ⁵	\$350,000.00	All assets of Hoplite
12	Anhinga Media Ltd	\$Unknown	Ink Therapy 2
13	Sulcata Productions Ltd.	\$Unknown	Charged and Disbarred 2
14	Gigamont Pictures Ltd.	\$Unknown	Geared Up
15	VBG 6725 Sunset LLC	\$12,092.50	Security Deposit
16	EDD	\$6,321.75	Tax lien

A copy of the Hoplite's Schedule D including amendments is attached to the Motion as Exhibit "2." A copy of Hoplite's claims register is attached to the Motion as Exhibit "3." A copy of the UCC-1 search performed is attached to the Motion as Exhibit "4."

Based upon a review of all of the foregoing, the Trustee determined that Gary Danklefsen holds the senior secured lien on the Program. With the transfer of the claim to SMF Fund I LLC ("SMF Fund"), the Trustee entered into a carve-out agreement with SMF Fund whereby SMF Fund agrees to carve-out for the benefit of the Estate 50% of the Purchase Price allocated to the Hoplite Estate. The remaining 50% will paid to SMF Fund upon the Effective Date.

Based upon a review of the Hoplite Entertainment's schedules, filed proofs of claim, and search of filed UCC-1s, the following are creditors that hold liens against Hoplite Entertainment:

Creditor	Amount	Collateral
Columbia State Bank	\$1,722,347.19	All assets of the Debtors
Bay Point Capital Partners II, LP	\$2,970,277.78	All assets of HEI
XXIII Capital Limited	\$4,444,371.02	All assets of HEI
OZE Lending 1, LLC	\$908,093.15	Multiple productions
VBG 6725 Sunset LLC	\$186,645	Commercial Lease
CT Corporation	Unknown	Multiple productions
BondIt	\$400,000.00	All asset of HEI
Created By Entertainment LLC	Unknown	Multiple productions

⁴ According to the Debtor's schedules, Chad Oliver/Charlie's Talent holds a secured claim, but according to the proof of claim filed by Chad Oliver/Charlie's Talent, it does not hold a secured claim. As such, it is being treated as an unsecured creditor.

⁵ On April 21, 2023, a notice of transfer of Mr. Danklefsen's claim to SMF Fund I LLC was filed with the Court.

1 A copy of HEI's Schedule D including amendments is attached to the Motion as
2 Exhibit "5." A copy of HEI's claims register is attached to the Motion as Exhibit "6." A
copy of the UCC-1 search performed is attached to the Motion as Exhibit "7."

3 Based upon a review of all the information provided to the Trustee, 23 Capital
4 holds the senior secured lien on the assets of HEI. The Trustee entered into a carve-out
agreement with 23 Capital whereby 23 Capital agrees to carve-out for the benefit of the
5 Estate 50% of the Purchase Price allocated to the HEI Estate. The remaining 50% will
paid to 23 Capital upon the Effective Date. The Trustee's counsel incurred approximately
6 \$15,056 in negotiating the carve-out, negotiating the terms of the sale, preparing the
asset purchase agreement, and preparing the sale motion. Because counsel's fees are
7 not final, this amount may change as time entries may be no charged and there may be a
carve-out of for other creditors.

8 Based on CR3's analysis of the Debtors' ownership of the TV Library, from the
cash aspect of the Purchase Price and absent any overbids, Hoplite Entertainment would
9 receive \$37,155.00 and Hoplite would receive \$12,845.00.

10 **PLEASE TAKE FURTHER NOTICE that all overbids must be in writing and**
11 **must be submitted to the Trustee's counsel whose address is listed in the top left-**
12 **hand corner of the first page of the instant Notice. Overbids are due two business**
13 **days prior to the hearing on this Motion, which is currently set for August 23, 2023**
14 **at 10:00 a.m. (i.e., August 21, 2023) ("Overbid Deadline").**

15 **PLEASE TAKE FURTHER NOTICE** that the overbid procedures sought to be
approved by the Court are as follows:

16 The Trustee proposes the following procedure to allow for overbids prior to the
17 Court's approval of the sale of the Assets to ensure the Assets are sold for the best
18 possible price:

- 19 1. Qualifying bidders ("Qualifying Bidder") shall:
 - 20 a. Bid at least \$290,000 in cash for the Assets;
 - 21 b. Set forth in writing the terms and conditions of the offer that are
22 at least as favorable to the Trustee as those set forth in the Agreement
23 attached to the Motion as Exhibit "1;"
 - 24 c. Be financially qualified, in the Trustee's exercise of his sound
business judgment, to close the sale;
 - 25 d. Submit an offer that does not contain any contingencies to
closing the sale, including, but not limited to, financing, inspection, or repair
contingencies;
 - 26 e. Deliver a written offer and evidence of financial qualification to
the Trustee's counsel (at the address shown in the upper left-hand corner of
the first page of this Motion) by no later than two business days prior to the
27 hearing on this Motion which is currently set for August 23, 2023 at
10:00 a.m. (i.e., August 21, 2023) ("Overbid Deadline"). In his absolute and
sole discretion, the Trustee shall have the right to accept additional overbids
submitted after the Overbid Deadline.
- 28 2. If the Trustee receives a Qualified Bid by the Overbid Deadline, an
auction will take place at the time of the hearing on the Motion ("Auction"). Only the
Buyer and any party who is deemed a Qualifying Bidder shall be entitled to bid.
3. Any incremental bid in the bidding process shall be at least \$5,000.00
higher than the prior bid for the Assets.
4. Upon conclusion of the Auction, the Trustee shall decide, subject to
Court approval, which of the bids is the best bid, and such bid shall be deemed to

1 be the "Successful Bid." The bidder who is accepted by the Trustee as the
2 successful bidder ("**Successful Bidder**") must pay all amounts reflected in the
3 Successful Bid in cash no later than 5 days after the Effective Date. The Trustee
4 may also acknowledge a back-up bidder ("**Back-Up Bidder**") which shall be the
5 bidder with the next best bid. Should the Successful Bidder fail to close the sale of
6 the Assets, the Trustee may sell the Assets to the Back-Up Bidder without further
7 Court order.

8 5. Overbids shall be all cash and no credit shall be given to the
9 purchaser or overbidder(s).

10 The Motion is based upon the Memorandum of Points and Authorities, the
11 Declarations of Edward M. Wolkowitz, Beth E. Gaschen, Matthew Helderman, Miles
12 Staglik, and the Exhibits attached to the Motion, all pleadings, papers and records on file
13 with the Court, and on such other evidence, oral or documentary, as may be presented to
14 the Court at the time of the hearing on the Motion.

15 **Your Rights May Be Affected.** You should read these papers carefully and
16 discuss them with your attorney if you have one. (If you do not have an attorney, you may
17 wish to consult one.)

18 **Deadline for Opposition Papers.** The Motion is being heard on regular notice
19 pursuant to LBR 9013-1. If you wish to oppose the Motion, you must file a written
20 response with the Court and serve a copy of it upon the Movant or Movant's attorney at
21 the address set forth above no less than **14 days** prior to the above hearing date. If you
22 fail to file a written response to the Motion within such time period, the Court may treat
23 such failure as a waiver of your right to oppose the Motion and may grant the requested
24 relief.

25 **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure.** The
26 undersigned hereby verifies that the above hearing date and time were available for this
27 type of Motion according to the judge's self-calendaring procedures.

28 **PLEASE TAKE FURTHER NOTICE** that any party requesting a copy of the Motion
or any supporting documents filed with the Court with respect to the Motion may contact
counsel for the Trustee, Beth E. Gaschen, Golden Goodrich LLP by email at
bgaschen@go2.law, by mail at 650 Town Center Drive, Suite 600, Costa Mesa, California
92626, or by telephone at (714) 966-1000.

Dated: August 2, 2023

GOLDEN GOODRICH LLP

By: /s/ Beth E. Gaschen
JEFFREY I. GOLDEN
BETH E. GASCHEN
Attorneys for Chapter 7 Trustee
Edward M. Wolkowitz

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 600, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S MOTION FOR ORDER: (1) AUTHORIZING SALE OF PERSONAL PROPERTY FREE AND CLEAR OF LIENS, CLAIMS, AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(b) AND (f); (2) APPROVING OVERBID PROCEDURES; (3) APPROVING BUYER, SUCCESSFUL BIDDER, AND BACK-UP BIDDER AS GOOD-FAITH PURCHASER PURSUANT TO 11 U.S.C. § 363(m); (4) WAIVING ANY LODGING PERIODS AND ANY STAY OF THE ORDER ON THE MOTION AND (5) APPROVING SETTLEMENT PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019;** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 2, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **August 2, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 2, 2023
Date

David M. Fitzgerald
Printed Name


Signature

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Richard T Baum rickbaum@hotmail.com, rickbaum@ecf.inforuptcy.com
Tanya Behnam tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;laddocketing@polsinelli.com
Reem J Bello rbello@goeforlaw.com, kmurphy@goeforlaw.com
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Luke N Eaton eatonl@pepperlaw.com, jacqueline.sims@troutman.com
Beth Gaschen bgaschen@go2.law,
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kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wgllp.com;gestrada@wgllp.com;golden.jeffreyi.b117954@n
otify.bestcase.com
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United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
Harris Winsberg hwinsberg@phrd.com
Edward M Wolkowitz (TR) emwtrustee@lnbyg.com, ecf.alert+Wolkowitz@titlexi.com
Hatty K Yip hatty.yip@usdoj.gov, hatty.k.yip@usdoj.gov

SERVED BY UNITED STATES MAIL:

Hoplite Entertainment, Inc.
Attn: President/Officer/Agent
506 North Croft Avenue
Los Angeles, CA 90048-2511

Hoplite, Inc.
Attn: President/Officer/Agent
506 North Croft Avenue
Los Angeles, CA 90048-2511

BondIt LLC / Buffalo 8 Productions LLC
Attn: Matthew Helderman, CEO
1639 11th St. #160
Santa Monica, CA 90404

Titan Entertainment, LLC
439 N. Canon Drive, Suite 200
Beverly Hills, California 90210

Titan Entertainment, LLC
c/o Johnson & Johnson LLP
Attn: Neville L. Johnson
439 N. Canon Dr., Suite 200,
Beverly Hills, California 90210

Titan LLC
5020 East Washington Blvd
Commerce CA 90040

Bay Point Capital Partners II, LP
Attn: Managing Partner
3050 Peachtree Rd, Suite 740
Atlanta, GA 30305-2212

Columbia Bank
Attn: President/Officer/Agent
1301 A St
Tacoma, WA 98402-4200

Columbia State Bank
Attn: Officer/President/Agent
2049 Century Park East, Ste. 2900
Los Angeles, CA 90067

Columbia State Bank
Attn: President/Officer/Agent
P.O. Box 2156; MS 6115
Tacoma, WA 98401-2156

OZE Lending 1, LLC
c/o Moritt Hock & Hamroff LLP
1407 Broadway, 39th Floor
New York, NY 10018-5100

OZE Lending
258 Vreeland Rd Ste 201
Florham Park, NJ 07932

Porta Pellex LLC
Attn: Kristofer Larson
999 N Northlake Way Ste 213
Seattle, WA 98103-3444

Gary Danklefsen
c/o Cairncross & Hempelmann, P.S.
524 Second Avenue, Suite 500
Seattle, WA 98104-2323

Porta Pellex LLC
c/o Larson Law Firm
701 5th Ave Ste 4200
Seattle, WA 98104-7047

Employment Development Department
Bankruptcy Group MIC 92E,
PO BOX 826880
Sacramento, CA 95814

Richard Peterson
13420 NE 83rd St
Redmond, WA 98052-1948

Corporation Service Company
801 Adlai Stevenson Dr.
Springfield, IL 62703

SMF Fund 1
13420 NE 83rd St
Redmond, WA 98052-1948

Sulcata Productions Limited
3rd Floor, 14 Floral Street
London, WC2E 9DH UK

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 600, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF SALE OF ESTATE PROPERTY** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 2, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 2, 2023

Date

David M. Fitzgerald

Printed Name



Signature

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

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